

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ALEXANDER COTTO DELGADO
GRISELLE CRUZ CRUZ

DEBTORS

CASE NO. 19-02213/MCF

CHAPTER 13

**DEBTORS' REPLY TO *TRUSTEE'S MOTION TO DISMISS*, DOCKET NO. 34
TO THE HONORABLE COURT:**

NOW COME, ALEXANDER COTTO DELGADO and GRISELLE CRUZ CRUZ, the Debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. On July 19, 2021, the Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 34, basically stating that the Debtor's Plan payments are in arrears in the sum of \$300.00 in the above captioned case.

2. The Debtors hereby submit that on August 14, 2021 they made one (1) \$300.00 payment to the Trustee. Attached is copy of the money order number 27547308797, curing the Plan arrears in the above captioned case.

3. The Debtors respectfully state that they are up-to-date in the Plan payments to the Trustee.

WHEREFORE Debtors respectfully pray that the *Trustee's Motion to Dismiss* for failure to make current Plan payments, Docket No. 34, be denied.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to the Chapter 13 Trustee, I also certify that a copy of this motion was sent via US Mail to the Debtors to the address of record.

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Debtor's Reply to Motion to Dismiss
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RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 16th day of August, 2021.

/s/Roberto Figueroa Carrasquillo
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UNITED STATES POSTAL SERVICE		POSTAL MONEY ORDER	
Serial Number	27547308797	Year, Month, Day 2021-08-14	Post Office 007251
		U.S. Dollars and Cents \$300.00	
		Three Hundred Dollars and 00/100	
		Amount	Clerk 20
Pay to	Alejandro Olivera Rivera		
Address	Chapter 13 trustee		
	P.O. Box 71486		
Memo	Case NO. 19-02213-MCF		
1:00000080021:		SEE REVERSE WARNING • NEGOTIABLE ONLY IN THE U.S. AND POSSESSIONS	
		27547308797	